

THE LAW FIRM OF

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## MEMORANDUM ENDORSED

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February 24, 2023

*Via ECF*

The Honorable Gregory H. Woods  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl St.  
New York, New York 10007

USDC SDNY  
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*Re: United States v. Christopher Santos, 22 Cr. 522 (GHW)*

Dear Judge Woods,

We write to request, with the consent of the government and Pretrial Services, that Mr. Santos's bail conditions be modified to permit Mr. Santos to visit his mother on a schedule set by Pretrial Services. This will be crucial for Mr. Santos to be eligible to receive the kidney transplant that he desperately needs.

Mr. Santos currently does not have proper functioning kidneys and is awaiting a transplant. As a result, he is treated three times a week with dialysis. After attending his dialysis appointments, Mr. Santos is left physically drained and unable to cook for himself. The location of his dialysis treatments is close to his mother's residence. Prior to his arrest, following his dialysis treatment, he would visit his mother who would cook for him at her house. He would eat and rest and return to his home somewhat rested and nourished. With his current restrictions, Mr. Santos is unable to visit his mother after his dialysis. He returns home after dialysis extremely fatigued and eats whatever is available, usually fast food, which is far from ideal nourishment following kidney dialysis.

As noted above, Mr. Santos is currently on a kidney transplant waiting list. To be eligible for a donor kidney, a candidate must be healthy enough to receive the kidney. Since his arrest and home confinement, Mr. Santos' health has deteriorated, which is putting his candidacy for transplant in jeopardy.

Finally, as Mr. Santos was placed on home confinement before any of his co-defendants were indicted, his conditions of pretrial release do not preclude him from having contacts with any co-

defendants. The government requests and the defense consents to a modification that includes this condition.

Accordingly, we respectfully request that the court modify Mr. Santos's conditions of release to permit him to see his mother after his dialysis treatments on a schedule predetermined by Pretrial Services.

Respectfully submitted,

/s/

César de Castro

cc: All Parties (*via* ECF)

Application granted. The conditions of Mr. Santos' pretrial release are modified as follows: Mr. Santos may visit his mother following his dialysis treatments on a schedule to be determined by Pretrial Services. In addition, the defendant may not have contact with any of his co-defendants. The remaining conditions of Mr. Santos' pretrial release remain in full force and effect.

The Clerk of Court is directed to terminate the gavel pending at Dkt. No. 108

SO ORDERED.

Dated: February 27, 2023  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge